

The Patent Office asserts that Lidbetter discloses a method whereby a tracking/control channel radio link is established to provide synchronization of the moving base station with a satellite and in turn with the terrestrial network. The Patent Office argues that the term “transport connection” should be given its broadest interpretation and the tracking links in Lidbetter teach the transport connection. Applicants respectfully disagree.

During patent examination, the pending claims must be given the broadest reasonable interpretation consistent with the specification. *In re Prater*, 415 F.2d 1393 (CCPA 1969). However, the Patent Office’s interpretation of the term “transport connection” is inconsistent with the specification.

As discussed in the Description of the Prior Art section, the conventional mobile phone connection process has four steps: requesting connection of the telephone of a passenger 1 to the equipment unit A; requesting a connection between the equipment unit A and the equipment unit B; setting up and activating the connection between the equipment units A and B; and connecting the equipment unit B to a user 2. Applicants believe that the time to set up the connection between the equipment units A and B delays setting the mobile telephone connection between the two users 1 and 2. The claimed invention sets up at least one transport connection between a vehicle and a public land mobile network before receiving a call request and for then using the transport connection for a call as soon as a request to set up a call is received. Accordingly, the claimed invention uses the transport connection to eliminate step 2 and part of step 3. Applicants use the term “transport connection” to distinguish the connection between equipment units A and B which can eliminate step 2 and part of step 3 from the prior art

connection method from the link between units A and B in the prior art method which provides synchronization only.

However, the radio links in Lidbetter are used in a wireless telecommunication system, with part of it onboard a ship, for synchronization only. There is no teaching or suggestion in Lidbetter indicating that the radio links are different in any way from the connection between equipment units A and B of the prior art of the present application. Specifically, in the system shown in Fig. 1 of Lidbetter, an on-board base transceiver site (BTS) 12 needs to request for and set up a connection with a shore-based base cite controller (BSC) 40 via the radio track link; in the system shown in Fig. 2 of Lidbetter, an on-board BSC 14 needs to request for and set up a connection with a shore-based mobile switching center (MSC) 41; and in the system shown in Fig. 3 of Lidbetter, an on-board MSC 16 needs to request for and set up a connection with a shore-based MSC 41.

Accordingly, reading the radio link for synchronization disclosed in Lidbetter on the recited transport connection is inconsistent with the specification, and it is improper for the Patent Office to do so.

As set forth in Federal Circuit caselaw and the MPEP, Applicants may be their own lexicographer as long as the meaning assigned to the term is not repugnant to the term's well known uses. *In re Hill*, 161, F.2d 367 (CCPA 1947). Here, to distinguish from the synchronization link in the conventional method, Applicants define the connection between the vehicle and the public land mobile network which eliminates the steps for requesting and setting

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up a connection therebetween as a “transport connection.” Thus, it is improper for the Examiner to read the synchronization link on the claimed transport connection.

Based at least on the foregoing reasons, Applicants respectfully resubmit that Lidbetter fails to teach or suggest the recited transport connection. Applicants submit that claims 1-3 are allowable over Lidbetter, and respectfully request that that Patent Office reconsider and withdraw the § 102(b) rejection of claims 1-3.

2. Claim 4 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lidbetter in view of Horrер (U.S. Patent No. 6,321,084). Applicants traverse the § 103(a) rejection of claim 4 for at least the following reasons.

According to Lidbetter, one disadvantage of its prior art is that users cannot use their cellular telephone when traveling on board a ship or other vehicle. *See, e.g.*, paragraph 0005 of Lidbetter. In Horrер, however, the user cannot use his/her mobile phone and must use an on-board telephone 2 or 3. *See, e.g.*, Fig. 1; col. 6, lines 52-58; and col. 7, lines 25-28 of Horrер. Thus, the Horrер method is exactly the type of method distinguished by Lidbetter. There is no reason for a skilled artisan to combine the two references.

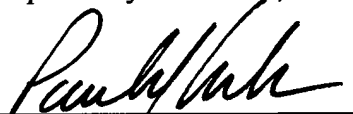
Based at least on the foregoing reasons, Applicants respectfully submit that claim 4 is allowable over the combination of Lidbetter and Horrер, and respectfully request that that Patent Office reconsider and withdraw the § 103(a) rejection of claim4.

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In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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23373

CUSTOMER NUMBER

Date: August 9, 2005